IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

In Re: Zoe M. Artis,	*	Case No.: 09-25699
	*	(Chapter 13)
Debtor.	*	

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DEBTORS' OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY

NOW COME the Debtor, by and through Adam M. Freiman, undersigned counsel, and in filing this *Debtors' Opposition to Creditor's M otion for Relief From Automatic Stay* states:

1-5. Admit.

6-16. Deny. More specifically, Debtor denies that her residence is encumbered by any valid Deed of Trust.

A. Debtor denies that Creditor possesses an original of any Deed of Trust bearing her genuine signature and demands that Creditor produce same and prove that it contains her signature.

B. Debtor denies that she ever signed the purported Deed of Trust and/or the Note.

C. Debtor denies that she borrowed any sum of money from the Creditor.

D. Debtor admits that she has not made any payments on the alleged Deed of Trust and/or Note. She has made no payment because she owes no debt to the alleged Creditor.

WHEREFORE, Debtor respectfully request that the Creditor's Motion be **DENIED**.

Respectfully submitted,

November 30, 2009

/s/ Adam M. Freiman

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Counsel for the Debtors/Movants

CERTIFICATE OF SERVICE

The Chapter 13 Trustee will be served electronically. On November 30, 2009, Counsel for Creditor was served both electronically and via first class mail at the address below:

Kevin Feig, Esq
Bierman, Giesing and Ward
4520 East West Highway, Suite 200
Bethesda MD 20814

/s/ Adam M. Freiman
Adam M. Freiman